

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Lori F. Kaplan
Commissioner

6015

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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**DePuy Orthopaedics, Inc.
700 Orthopaedic Drive
Warsaw, Indiana 45681**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-15832-00048	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 5, 2003 Expiration Date: September 5, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary orthopaedic appliances manufacturing source.

Responsible Official:	Vice President, Operations, DePuy Orthopaedics, Inc.
Source Address:	700 Orthopaedics Drive, Warsaw, Indiana 45681
Mailing Address:	700 Orthopaedics Drive, Warsaw, Indiana 45681
Source Phone Number:	(219) 267-8143
SIC Code:	3842
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) paint booths, identified as SB1, SB2 and SB3, installed in 1985, 1987, and 1987 respectively, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E85, E86, and E87, respectively.
- (b) Three (3) paint booths, identified as SB4, SB5, and SB6, installed in 2002, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E105, E106 and E107, respectively.
- (c) One (1) polishing operation, consisting of 40 polishing jacks, installed between 1981 and 1998, each with a maximum throughput of 10 pieces per hour, using wet dust collectors 00222 and 00266 for PM control, and exhausting through stacks WDC1 and WDC2.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Activities with emissions equal to or less than the following thresholds: 5.0 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:
 - (1) One (1) Zyglo dipping process, identified as emission units 85105 and 85106, installed in 1997 and 2000, respectively, with a total maximum capacity of 100 units per hour and venting internally.

- (2) One (1) Dip Seal process, identified as emission unit 72043, installed in 1993, with a maximum capacity of 100 units per hour and venting internally.
 - (3) One (1) SIS Cleaning Process, identified as emission unit E75, installed in 1998, with a maximum solvent throughput of 0.045 tons per year and venting internally.
 - (4) One (1) Acetic Acid Sterilizing process, identified as emission unit E121, installed in 1995, with a maximum solvent throughput of 0.44 tons per year and venting internally.
 - (5) One (1) isopropyl acid wipe-down process, installed in 1980, with a maximum solvent throughput of 0.8 tons per year and venting internally.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) ultrasonic, water-based, detergent cleaner/degreasers, identified as emission units 86105/86106, 85105, 85106 and 83122, installed in 1992, 1997, 2000 and 1994, respectively.
 - (c) Liquefied petroleum gas-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour: three liquefied petroleum gas fired fork lift trucks rated at 48, 49 and 90 HP, respectively.
 - (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Numerous natural gas rooftop heaters, with individual heat input capacities ranging from 0.045 to 0.8 MMBtu/hr and an aggregate heat input capacity of 17.2 MMBtu/hr.
 - (e) Emergency generators as follows: diesel generators not exceeding 1600 horsepower: Two (2) 328 hp generators.
 - (f) A stationary fire pump.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1st of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within thirty (30) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the OAQ Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

and

Telephone Number: 1-800-753-5519 or (219) 245-4870

Facsimile Number: (219) 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is

due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar

approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or

more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee

may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.
The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the

Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1st of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source;
 - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule")) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

**C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)]
[40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]**

- (a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
 - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
 - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
 - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V

DePuy Orthopaedics, Inc.
Warsaw, Indiana
Permit Reviewer: ERG/BS

Page 26 of 37
T085-15832-00048

Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Three (3) paint booths, identified as SB1, SB2, and SB3, installed in 1985, 1987, and 1987 respectively, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E85, E86, and E87, respectively.
- (b) Three (3) paint booths, identified as SB4, SB5, and SB6, installed in 2002, each equipped with an airless spray gun, for metal parts, with a maximum capacity at each spray gun of 0.125 units per hour, using dry filters for overspray control and exhausting to stacks E105, E106, and E107, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) Limit [326 IAC 8-2-9]

- (a) Paint booths SB4, SB5 and SB6 shall each use less than fifteen (15) pounds per day of VOC, including coatings, dilution solvents and cleaning solvents. This usage limit is required to limit each booth's potential to emit VOC to less than 15 pounds per day. Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.
- (b) Any change or modification which may increase the VOC potential to emit of paint booths SB1, SB2, or SB3 to 25 tons per year or more, per booth, shall require prior approval by the IDEM, OAQ before such changes may take place.

D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP/MSOP 085-13979-00048, issued June 28, 2001, and 40 CFR 52 Subpart P, the particulate matter from the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booths shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below for booths SB1 through SB6. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit in Condition D.1.1(a) and the requirement in Condition D.1.1(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (2) The cleanup solvent usage for each day;
 - (3) The total VOC usage for each day; and
 - (4) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain copies of the training program, the list of trained operators, and additional inspections prescribed by the Preventive Maintenance Plan. Training records shall be maintained on site or available within 1 hour for inspection by IDEM, OAQ.
- (c) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (c) One (1) polishing operation, consisting of 40 polishing jacks, installed between 1981 and 1998, each with a maximum throughput of 10 pieces per hour, using wet dust collectors 00222 and 00266 for PM control, and exhausting through stacks WDC1 and WDC2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the total allowable particulate emission rate from the polishing operations shall not exceed 1.30 pounds per hour when operating at a total process weight rate of 360 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1, the wet dust collectors for particulate control shall be in operation and control emissions from the polishing operations at all times that the polishing operations are in operation.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) Activities with emissions equal to or less than the following thresholds: 5.0 tons per year PM or PM₁₀, 10 tons per year SO₂, NO_x or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:
 - (1) One (1) Zyglo dipping process, identified as emission units 85105 and 85106, installed in 1997 and 2000, respectively, with a total maximum capacity of 100 units per hour and venting internally.
 - (2) One (1) Dip Seal process, identified as emission unit 72043, installed in 1993, with a maximum capacity of 100 units per hour and venting internally.
 - (3) One (1) SIS Cleaning Process, identified as emission unit E75, installed in 1998, with a maximum solvent throughput of 0.045 tons per year and venting internally.
 - (4) One (1) Acetic Acid Sterilizing process, identified as emission unit E121, installed in 1995, with a maximum solvent throughput of 0.44 tons per year and venting internally.
 - (5) One (1) isopropyl acid wipe-down process, installed in 1980, with a maximum solvent throughput of 0.8 tons per year and venting internally.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) ultrasonic, water-based, detergent cleaner/degreasers, identified as emission units 86105/86106, 85105, 85106 and 83122, installed in 1992, 1997, 2000 and 1994, respectively.
- (c) Liquified petroleum gas-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour: three liquified petroleum gas fired fork lift trucks rated at 48, 49 and 90 HP, respectively.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Numerous natural gas rooftop heaters, with individual heat input capacities ranging from 0.045 to 0.8 MMBtu/hr and an aggregate heat input capacity of 17.2 MMBtu/hr.
- (e) Emergency generators as follows: diesel generators not exceeding 1600 horsepower: Two (2) 328 hp generators.
- (f) A stationary fire pump.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no specifically applicable requirements for these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: DePuy Orthopaedics, Inc.
Source Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Mailing Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Part 70 Permit No.: T085-15832-00048

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: DePuy Orthopaedics, Inc.
Source Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Mailing Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Part 70 Permit No.: T085-15832-00048

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- c The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - c The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Monthly Usage Report

Source Name: DePuy Orthopaedics, Inc.
Source Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Mailing Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Part 70 Permit No.: T085-15832-00048
Facilities: SB4, SB5, SB6
Parameter: VOC usage
Limit: Less than 15 pounds per day per booth

For each quarterly reporting period, submit nine monthly reports (one per booth per month).

Month: _____ Year: _____

Day				Day			
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: DePuy Orthopaedics, Inc.
Source Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Mailing Address: 700 Orthopaedics Drive, Warsaw, Indiana 45681
Part 70 Permit No.: T085-15832-00048

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

September 5, 2003
Indiana Department of Environmental Management
Office of Air Quality

**Addendum to the Technical Support Document for a
Part 70 Operating Permit**

Source Background and Description

Source Name: DePuy Orthopaedics, Inc.
Source Location: 700 Orthopaedics Drive, Warsaw, Indiana 45681
County: Kosciusko
SIC Code: 3842
Operation Permit No.: T085-15832-00048
Permit Reviewer: ERG/BS

On June 16, 2003, the Office of Air Quality (OAQ) had a notice published at the Warsaw Community Public Library, 310 E. Main Street, Warsaw, IN 46580 and the OAQ Northern Regional Office, 220 West Colfax Avenue, Suite 200, South Bend, IN 46601 stating that Depuy Orthopaedics, Inc. ("DePuy") had applied for Part 70 permit for the operation of a stationary orthopaedic appliances manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 14, 2003, DePuy submitted comments on the proposed Part 70 permit. The following is a summary of the comments and responses to those comments. The Table Of Contents has been modified, if applicable, to reflect any changes.

Comment 1:

The orthopaedic appliances DePuy manufactures are often polished as a finishing step. The insignificant "degreasers" identified in the permit are actually cleaners made specifically for the removal of the polishing compounds we use. Please refer to them as ultrasonic cleaner/degreasers in the permit.

Response to Comment 1:

The following changes have been made to the permit in response to Comment 1:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) ultrasonic, water-based, detergent **cleaner**/degreasers, identified as emission units 86105/86106, 85105, 85106 and 83122, installed in 1992, 1997, 2000 and 1994, respectively.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) ultrasonic, water-based, detergent **cleaner**/degreasers, identified as emission units 86105/86106, 85105, 85106 and 83122, installed in 1992, 1997, 2000 and 1994, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no specifically applicable requirements for these facilities.

September 5, 2003
Indiana Department of Environmental Management
Office of Air Quality

**Addendum to the Technical Support Document for a
Part 70 Operating Permit**

Source Background and Description

Source Name: DePuy Orthopaedics, Inc.
Source Location: 700 Orthopaedics Drive, Warsaw, Indiana 45681
County: Kosciusko
SIC Code: 3842
Operation Permit No.: T085-15832-00048
Permit Reviewer: ERG/BS

On June 16, 2003, the Office of Air Quality (OAQ) had a notice published at the Warsaw Community Public Library, 310 E. Main Street, Warsaw, IN 46580 and the OAQ Northern Regional Office, 220 West Colfax Avenue, Suite 200, South Bend, IN 46601 stating that Depuy Orthopaedics, Inc. ("DePuy") had applied for Part 70 permit for the operation of a stationary orthopaedic appliances manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

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Response to Comment 1:

The following changes have been made to the permit in response to Comment 1:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) ultrasonic, water-based, detergent **cleaner**/degreasers, identified as emission units 86105/86106, 85105, 85106 and 83122, installed in 1992, 1997, 2000 and 1994, respectively.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) ultrasonic, water-based, detergent **cleaner**/degreasers, identified as emission units 86105/86106, 85105, 85106 and 83122, installed in 1992, 1997, 2000 and 1994, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no specifically applicable requirements for these facilities.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company N Depuy Orthopaedics, Inc.
Address Cit 700 Orthopaedic Dr., Warsaw, IN 45681
Part 70 perr T085-15832-00048
Reviewer: ERG/BS
Date: *****

Unit	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential to Emit VOC (tons/yr)	Potential to Emit Particulate (ton/yr)	lb VOC/gal solids	Transfer Efficiency
SB1	Toluene	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.65000	0.125	7.26	7.26	0.59	14.16	2.58	0.00	ERR	75%
	Paraloid	7.9	56.00%	0.0%	56.0%	0.0%	44.00%	0.15000	0.125	4.44	4.44	0.08	2.00	0.36	0.07	10.08	75%
SB2	Toluene	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.65000	0.125	7.26	7.26	0.59	14.16	2.58	0.00	ERR	75%
	Paraloid	7.9	56.00%	0.0%	56.0%	0.0%	44.00%	0.15000	0.125	4.44	4.44	0.08	2.00	0.36	0.07	10.08	75%
SB3	Toluene	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.65000	0.125	7.26	7.26	0.59	14.16	2.58	0.00	ERR	75%
	Paraloid	7.9	56.00%	0.0%	56.0%	0.0%	44.00%	0.15000	0.125	4.44	4.44	0.08	2.00	0.36	0.07	10.08	75%
SB4	Toluene	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.65000	0.125	7.26	7.26	0.59	14.16	2.58	0.00	ERR	75%
	Paraloid	7.9	56.00%	0.0%	56.0%	0.0%	44.00%	0.15000	0.125	4.44	4.44	0.08	2.00	0.36	0.07	10.08	75%
SB5	Toluene	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.65000	0.125	7.26	7.26	0.59	14.16	2.58	0.00	ERR	75%
	Paraloid	7.9	56.00%	0.0%	56.0%	0.0%	44.00%	0.15000	0.125	4.44	4.44	0.08	2.00	0.36	0.07	10.08	75%
SB6	Toluene	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.65000	0.125	7.26	7.26	0.59	14.16	2.58	0.00	ERR	75%
	Paraloid	7.9	56.00%	0.0%	56.0%	0.0%	44.00%	0.15000	0.125	4.44	4.44	0.08	2.00	0.36	0.07	10.08	75%

State Potential Emissions

17.69

0.43

These calculations were taken from CP/MSOP 085-13979-00048, issued 6/28/01

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculation Page 2 of 5 TSD App A
Natural Gas Combustion, <10 MMBtu/hr

Company N Depuy Orthopaedics, Inc.
Address Cit 700 Orthopaedic Dr., Warsaw, IN 45681
Part 70 per T085-15832-00048
Reviewer: ERG/BS
Date: 11/22/02

<u>Type of FCU</u>	<u>ID#</u>	<u>MMBTU/hr</u>	<u>Type of FCU</u>	<u>ID#</u>	<u>MMBTU/hr</u>	<u>Type of FCU</u>	<u>ID#</u>	<u>MMBTU/hr</u>
Roof Top He	E22	0.1	Roof Top He	22	0.086	Roof Top He	**	0.36
Roof Top He	E23	0.05	Roof Top He	24	0.125	Roof Top He	**	0.25
Roof Top He	E24	0.13	Roof Top He	25	0.08	Roof Top He	**	0.373
Roof Top He	E51	0.1	Roof Top He	26	0.086	Roof Top He	**	0.373
Roof Top He	E54	0.1	Roof Top He	27	0.18	Roof Top He	**	0.373
Roof Top He	E55	0.1	Roof Top He	30	0.063	Roof Top He	**	0.373
Roof Top He	E65	0.165	Roof Top He	33	0.08	Roof Top He	**	0.373
Roof Top He	E66	0.2	Roof Top He	37	0.0625	Roof Top He	**	0.373
Roof Top He	E18	0.165	Roof Top He	38	0.08	Roof Top He	**	0.373
Roof Top He	E19	0.175	Roof Top He	39	0.0625	Roof Top He	**	0.373
Roof Top He	E67	0.195	Roof Top He	40	0.125	Roof Top He	**	0.373
				41,				
				42,				
Roof Top He	1	0.08	Roof Top He	43	0.1155	Roof Top He	**	0.43
Roof Top He	2	0.225	Roof Top He	44	0.115	Roof Top He	**	0.43
Roof Top He	3	0.25	Roof Top He	45	0.2875	Roof Top He	**	0.2
Roof Top He	4	0.225	Roof Top He	46	0.1155	Roof Top He	**	0.045
Roof Top He	5	0.25	Roof Top He	47	0.125	Roof Top He	**	0.25
				48,				
Roof Top He	6	0.225	Roof Top He	49	0.08	Roof Top He	**	0.25
				51,52				
				,53,5				
				7,58,				
Roof Top He	7	0.11	Roof Top He	59	0.1331	Roof Top He	**	0.59
Roof Top He	8	0.15	Roof Top He	60	0.05	Roof Top He	**	0.18
Roof Top He	9	0.225	Roof Top He	61	0.1155	Roof Top He	**	0.275
Roof Top He	10	0.15	Roof Top He	62	0.1155	Roof Top He	**	0.275
				63,				
Roof Top He	11	0.115	Roof Top He	64	0.158	Roof Top He	**	0.275
				67,				
Roof Top He	15	0.1155	Roof Top He	68	0.12	Roof Top He	**	0.115
Roof Top He	16	0.1155	Roof Top He	69	0.115	Roof Top He	**	0.485
Roof Top He	17, 18	0.225	Roof Top He	70	0.12	Roof Top He	**	0.36
Roof Top He	19	0.115	Roof Top He	71	0.12	Roof Top He	**	0.36
Roof Top He	20	0.115	Roof Top He	72	0.8	Roof Top He	**	0.373
				73,				
Roof Top He	21	0.125	Roof Top He	74	0.115	Roof Top He	**	0.2

Total source-w 17.19

Heat Input Capacity
MMBTU/hr

Potential Throughput
MMCF/yr

17.2

150.6

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see bel	5.5	84.0
Potential Emission in tons/yr	0.6	0.6	0.05	7.5	0.4	6.3

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Note that HAP emissions from these sources are negligible.

These calculations were taken from CP/MSOP 085-13979-00048, issued 6/28/01

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Page 3 of 5 TSD AppA

Compa Depuy Orthopaedics, Inc.
Addres 700 Orthopaedic Dr., Warsaw, IN 45681
Part 70 T085-15832-00048
Review ERG/BS
Date: 11/22/02

Unit	Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methyl Methacrylate	Weight % Diethylene Glycol Butyl Ether	Toluene Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Diethylene Glycol Butyl Ether Emissions (ton/yr)
SB 1	Toluene	7.3	0.65000	0.125	*****	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB2	Toluene	7.3	0.65000	0.125	*****	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB3	Toluene	7.3	0.65000	0.125	*****	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB4	Toluene	7.3	0.65000	0.125	*****	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB5	Toluene	7.3	0.65000	0.125	*****	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
SB6	Toluene	7.3	0.65000	0.125	*****	0.00%	0.00%	2.58	0.00	0.00
	Paraloid	7.9	0.15000	0.125	48.00%	2.00%	0.00%	0.31	0.01	0.00
Degreaser	Oakite	8.5	0.06250	3.000	0.00%	0.00%	10.00%	0.00	0.00	0.70

Total Potential Emissions (tpy)	17.38	0.08	0.70
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Total HAP Potential to Emit (tpy) 18.15

These calculations were taken from CP/MSOP 085-13979-00048, issued 6/28/01

METHODOLOGY

$$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$

Appendix A: Emissions Calculations
Polishing and Cleaning/Sterilizing Operations

Page 4 of 5 TSD App A

Compan Depuy Orthopaedics, Inc.
Address 700 Orthopaedic Dr., Warsaw, IN 45681
Part 70 ꝑ T085-15832-00048
Reviewe ERG/BS
Date: 11/22/02

Polishing Operations

The polishing operations are controlled with two wet dust collectors (WDC 1, WDC 2)

Amount of PM collected 37 pounds per day
Hours of Operation 8 hours per day
Estimated Control Efficiency 99.9 %
Amount of PM collected: 4.625 pounds/hour
Uncontrolled PM PTE: 4.630 pounds/hour

Uncontrolled PM PTE 20.28 tons per year
Controlled PM PTE 0.02 tons per year

Methodology

Uncontrolled PM PTE (tpy) = Amount of PM collected (lb/day) x 1/8 (day/hr) x 1/control efficiency x 8760 (hr)

Controlled PM PTE (tpy) = Uncontrolled PM PTE (tpy) x (1- control efficiency)

These calculations were taken from CP/MSOP 085-13979-00048, issued 6/28/01

Cleaning/Sterilizing Operations

Unit	Material	Total Use (t)	VOC PTE (t)
IPA Clean	Isopropyl Al	0.8	0.8
Sterilize	Acetic Acid	0.44	0.44
SIS Clean	Ethanol	0.05	0.05
		TOTAL	1.29

As a worst case estimate, it is assumed that 100% of the VOC used will be emitted

These calculations were taken from CP/MSOP 085-13979-00048, issued 6/28/01

Appendix A: Emissions Calculations
VOC
Degreasing Operations

Company N Depuy Orthopaedics, Inc.
Address Cit 700 Orthopaedic Dr., Warsaw, IN 45681
Part 70 pern T085-15832-00048
Reviewer: ERG/BS
Date: 11/22/02

Unit	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential to Emit VOC (tons/yr)	Potential to Emit Particulate (ton/yr)	lb VOC/gal solids	Transfer Efficiency
85105	Oakite	8.5	10.00%	0.0%	10.0%	0.0%	0.00%	0.06250	1.000	0.85	0.85	0.05	1.28	0.23	0.00	ERR	100%
85106	Oakite	8.5	10.00%	0.0%	10.0%	0.0%	0.00%	0.06250	1.000	0.85	0.85	0.05	1.28	0.23	0.00	ERR	100%
83122	Oakite	8.5	10.00%	0.0%	10.0%	0.0%	0.00%	0.06250	1.000	0.85	0.85	0.05	1.28	0.23	0.00	ERR	100%
86105/86106	Nitric Acid	11.6	0.00%	0.0%	0.0%	0.0%	0.00%	0.06250	1.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	100%

Total Potential Emissions

0.70 0.00

METHODOLOGY

These calculations were taken from CP/MSOP 085-13979-00048, issued 6/28/01

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used